

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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FARAH JEAN FRANCOIS,

Case No. 1:22-cv-4447

Plaintiff,

- against -

NOTICE OF MOTION

**VICTORY AUTO GROUP LLC d/b/a
VICTORY MITSUBISHI, SPARTAN
AUTO GROUP LLC d/b/a VICTORY
MITSUBISHI, STAVROS ORSARIS,
YESSICA VALLEJO, DAVID PEREZ,
DIANE ARGYROPOULOS, and
PHILIP ARGYROPOULOS**

Defendants.

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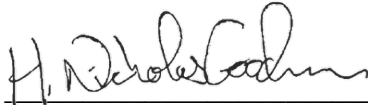
PLEASE TAKE NOTICE that Defendants **SPARTAN AUTO GROUP LLC d/b/a
VICTORY MITSUBISHI, STAVROS ORSARIS, YESSICA VALLEJO, and DAVID PEREZ,**
upon the accompanying Memorandum of Law in Support of Defendants' Motion for Reconsideration,
hereby move this Court, before the Hon. Jed S. Rakoff, at the United States Courthouse located at 500
Pearl Street, New York, New York, Courtroom 14-B, on August 16, 2023, at 9:00am for an Order,
pursuant to [Local Civil Rule 6.3 of the Local Rules of the United States District Courts for the
Southern and Eastern Districts of New York](#), granting Reconsideration of Defendants Summary
Judgment and, upon such reconsideration, dismissing Count I of Plaintiff's First-Amended Complaint
as to all Defendants in its entirety, together with such other and further relief as this Court deems just
and proper.

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Dated: New York, New York
August 1, 2023

Yours, etc.

NICHOLAS GOODMAN & ASSOCIATES, PLLC

BY: _____

H. Nicholas Goodman

Attorneys for Defendants

VICTORY AUTO GROUP LLC

d/b/a VICTORY MITSUBISHI,

SPARTAN AUTO GROUP LLC

d/b/a VICTORY MITSUBISHI,

STAVROS ORSARIS, YESSICA VELLEJO,

DAVID PEREZ, DIANE ARGYROPOULOS,

and PHILIP ARGYROPOULOS

333 Park Avenue South, Suite 3A

New York, New York 10010

(212) 227-9003

ngoodman@ngoodmanlaw.com

Via ECF

Emma Caterine

Ahmad Keshavarz

THE LAW OFFICE OF

AHMAD KESHAVARZ

16 Court Street, Suite 2600

Brooklyn, New York 11241

(917) 945-9848

emma@newyorkconsumerattorney.com

ahmad@newyorkconsumerattorney.com